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12 Special Counsel to Richard A. Marshack,  
13 Chapter 11 Trustee

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**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SANTA ANA DIVISION**

In re:

THE LITIGATION PRACTICE GROUP P.C.,  
Debtor.

Case No.: 8:23-bk-10571-SC

Chapter 11

**DECLARATION OF CHAPTER 11  
TRUSTEE'S COUNSEL REGARDING  
PROOF OF NOTICE OF HEARING AND  
SERVICE FOR MOTION OF TRUSTEE  
RICHARD A. MARSHACK FOR ENTRY  
OF AN ORDER (A) APPROVING SALE,  
SUBJECT TO OVERBID, OF ASSETS  
FREE AND CLEAR OF ALL LIENS,  
CLAIMS, ENCUMBRANCES AND  
INTERESTS PURSUANT TO 11 U.S.C.  
§ 363(b) AND (B) APPROVING  
ASSUMPTION AND ASSIGNMENT OF  
CERTAIN EXECUTORY CONTRACTS  
AND UNEXPIRED LEASES AND OTHER  
AGREEMENTS**

Date: July 10, 2023

Time: 2:00 p.m.

Judge: Hon. Scott C. Clarkson

Place: Courtroom 5C

411 W. Fourth Street

Santa Ana, CA 92701

1 I, JONATHAN SERRANO, declare:

2 1. I am an associate attorney in the law firm of Dinsmore & Shohl LLP, special counsel  
3 to Richard A. Marshack, the Chapter 11 Trustee for the bankruptcy estate of The Litigation Practice  
4 Group, P.C. in the above-captioned bankruptcy case. As such, except as expressly stated otherwise,  
5 I have personal knowledge of the facts set forth below and could and would competently testify  
6 under oath thereto if requested to do so.

7 1. At approximately 10:07 a.m. on Monday, July 10, 2023, I became aware that the  
8 Court scheduled a hearing on the *Motion of Trustee Richard A. Marshack for Entry of an Order (A)*  
9 *Approving Sale, Subject to Overbid, of Assets Free and Clear of All Liens, Claims, Encumbrances*  
10 *and Interests Pursuant to 11 U.S.C. § 363(b) and (B) Approving Assumption and Assignment of*  
11 *Certain Executory Contracts and Unexpired Leases and Other Agreements* (the “Motion”) for  
12 today, June 10, 2023 at 2:00 p.m., and that notice must be given by 11:00 a.m.

13 2. Immediately thereafter, I emailed Kenneth Miskin from the Office of the United  
14 States Trustee. Mr. Miskin and I exchanged a few emails, so I am confident he received notice of  
15 the hearing.

16 3. As I prepared to provide additional email notice, at approximately 10:35 a.m. on the  
17 same date, I learned that notice should be given telephonically.

18 4. By 11:00 a.m. on the same date, I called Garrick Hollander who represents Debt  
19 Validation Fund II, LLC, MC DVI Fund 1, LLC, and MC DVI Fund 2, LLC; Nicholas Koffroth  
20 who represents the Committee of Unsecured Creditors; Ronald Richards who represent a potential  
21 buyer; Russ Squires who is involved with a potential buyer; Joel Magolnick who is involved with a  
22 potential buyer; and Ramzig Izakelian who represents OHP-CDR, LP.

23 5. In addition, I reviewed the ECF list. The Court set the hearing on the Motion,  
24 thereby notifying those parties on the ECF list.

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1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3  
4 DATED: July 10, 2023

/s/ Jonathan Serrano

Jonathan Serrano

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Dinsmore & Shohl LLP  
550 S. Hope Street, Suite 1765  
Los Angeles, California 90071

A true and correct copy of the foregoing document entitled (*specify*): ***Declaration of Chapter 11 Trustee's Counsel Regarding Proof of Notice of Hearing and Service for Motion of Trustee Richard A. Marshack for Entry of an Order (A) Approving Sale, Subject to Overbid, of Assets Free and Clear of All Liens, Claims, Encumbrances and Interests Pursuant to 11 U.S.C. § 363(b) and (B) Approving Assumption and Assignment of Certain Executory Contracts and Unexpired Leases and other Agreements*** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 10, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) **July 10, 2023**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **July 10, 2023**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 10, 2023

Katrice Ortiz

/s/ Katrice Ortiz

Date

Printed Name

Signature

**In re The Litigation Practice Group, P.C.**  
**U.S.B.C., Central District of California, Santa Ana**  
**Case No. 8:23-bk-10571-SC**

**I. SERVED ELECTRONICALLY VIA NEF:**

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- **Johnny White:** JWhite@wrslawyers.com, jlee@wrslawyers.com;eweiman@wrslawyers.com

**B. SERVED VIA REGULAR U.S. MAIL:**

N/A

**III. SERVED VIA PERSONAL DELIVERY (MESSENGER):**

**United States Bankruptcy Court**

Honorable Scott Clarkson  
United States Bankruptcy Court  
Central District of California  
411 West Fourth Street, Suite 5130 / Courtroom 5C  
Santa Ana, California 92701